

EXHIBIT A

From: Michael J. Willemin <mwillemin@wigdorlaw.com>
Sent: Wednesday, April 24, 2024 5:57 PM
To: Amalfe, Christine A. <CAmalfe@gibbonslaw.com>
Cc: Judd Burstein (jburstein@burlaw.com) <jburstein@burlaw.com>; Jeanne M. Christensen <JChristensen@wigdorlaw.com>
Subject: RE: Parker v. Burstor

External Email: Use caution with links and attachments.

Christine,

Welcome to the case. We do object to the briefing being sealed. There was never any nonfrivolous basis to seek to have the complaint sealed in the first place. There is certainly no nonfrivolous basis for any objection to the original order now that you have seen the complaint. There is nothing in the complaint that you would have any nonfrivolous basis to assert should remain sealed. As such, there is no material that you could possibly reference in your briefing that could be subject to sealing.

The only claim that Judd made that could possibly have justified sealing is [REDACTED]

[REDACTED] Thus, as I have said to Judd, what you should be doing is writing to the court to let it know that you are not objecting to the R&R.

Thanks,

Michael J. Willemin

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From: Amalfe, Christine A. <CAmalfe@gibbonslaw.com>
Sent: Wednesday, April 24, 2024 5:35 PM

To: Michael J. Willemin <mwillemin@wigdorlaw.com>
Cc: Judd Burstein (jburstein@burlaw.com) <jburstein@burlaw.com>
Subject: Parker v. Burstor

Michael

As you likely noticed from the ECF notices, we are co-counsel for Scott Burstor in the above matter. As noted in our letter to the Judge on April 19, 2024, we will be submitting objections to the Magistrate Judge's Report and Recommendation regarding the sealing of the complaint on April 28, 2024. Given that the Report and Recommendation itself has been sealed by the court, we assume our objections will also be sealed. To avoid doubt however, we will be filing a letter motion to seal our objections to the Report and Recommendation with Judge Clarke pursuant to the direction in her Order of April 22, 2024 and consistent with Rule 5e of her Individual Rules and Practices.

We assume you have no objection to Defendants' objections to the sealed Report and Recommendation being filed under seal but I am happy to meet and confer with you as to this issue. Please let me know whether you consent to the sealing of the objections to be submitted on April 28 or if you object to same, and we will note that in our letter motion.

Thank you for your attention to this matter, and of course, I am happy to discuss by phone at your convenience as well.

Christine

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